

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,
and next friend “SUSAN;” and “MATTHEW,”
by guardian, parent, and next friend “MARK;”
on behalf of themselves and all those similarly
situated,

Case No. 1:25-cv-244

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

DECLARATION OF SUSAN

I, Susan, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Susan. I am over the age of 18 and am competent to testify regarding the matters described below. I am a putative class member in this case.
2. I am a citizen of Taiwan. I currently live in Utah.
3. I have lived in the United States for the past 12 years, since 2013.
4. I live with my husband and my four children under the age of 11. All four of my children were born in the United States.
5. In 2013, my husband and I came to the United States with student visas so that we could attend school.
6. My husband and I ended up building a life here. I am currently in the process of applying for lawful permanent status. My husband and I have maintained lawful status the entire time we have been in the United States.
7. We learned in or around August 2024 that I was pregnant with our fourth child

unexpectedly. I gave birth to our fourth child in April 2025 in Utah.

8. I heard about the president's executive order regarding birthright citizenship on or around January 20, 2025.

9. I understand that, because neither my husband nor I am a citizen or lawful permanent resident (LPR) of the United States, the government will not recognize my child's U.S. citizenship by birthright.

10. I am fearful for my fourth child's future in light of this executive order. My baby has the right to citizenship and a future in the United States. I want my baby to have access to opportunities, such as access to education and permission to work legally, in order to make a life for themselves. I also want my child to be safe. I do not want my child to live in fear and hiding. I do not want my child to be a target for immigration enforcement. This would affect the future of us as a family. All four of my children were born in the United States. I fear our family could be at risk of separation. I also do not want my children to have to move to Taiwan, a country to which they have no connection and do not speak the language.

11. I want to be a named plaintiff in this case. I understand that, if the Court grants the motion for class certification, I would represent a large number of people who: (a) do not have permanent status or citizenship; and (b) are expecting a child who will likely be born after the executive order goes into effect.

12. I understand that, as a class representative, it would be my responsibility to represent the interests of all the class members in this lawsuit, and not just my own personal interests. I also understand the need to stay informed about what is happening in the case.

13. I understand that I am agreeing to represent many other families like ours. I believe it is important to help families like ours.

14. I am scared about my identity and participation in this lawsuit being made public because I fear for my and my family's safety. I fear that certain individuals would retaliate against us because of my participation in the lawsuit. I have heard about the current Administration or supporters retaliating against people who sue or speak out against the Administration.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Susan
Susan

Executed on April 21, 2025.